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Mike Gallagher,
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Dear Ecology:

The Olympic Environmental Council has commented on your plan previously. We are pleased to see the PBT removal project move forward and again wish to add our voice.

We are concerned about the levels of persistent toxic chemicals found in our bodies and the environment and urge you to issue a strong rule for the Persistent Bioaccumulative Toxics (PBT) Program. It is critical, and this is no understatement, that the new rule strengthen the PBT program's ability to safeguard public health and the environment.

The PBT rule must

- * Contain a broad list of persistent toxic chemicals to be phased out. This list must be based on science, not politics, and include chemicals that currently are a problem in Washington state or have the potential to cause a problem in Washington state.
- * Include phthalates on the list of chemicals to be phased out. These chemicals were recently linked to reproductive problems in male infants,
- * Incorporate the goals of Ecology's 2000 PBT Strategy, with more emphasis on preventing the use and release of persistent toxic chemicals.
- * Incorporate the precautionary principle calling for taking anticipatory action to prevent harm when the best scientific evidence available shows

harm may occur .

- * Ensure that the goal of a phase-out plan (or chemical action plan) is to eliminate the chemical. Each plan must study and recommend safe substitutes to using the chemical and also include clear timelines for completion.

The OEC has to add that it is outrageous that pesticides and fertilizers have been exempted from the rule. Ecology should request immediately that the Legislature remove the exemption for these dangerous chemicals so that they can be addressed as part of the PBT program. We know that all categories of fertilizers not certified organic contain PBTs; indeed a massive portion of PBTs flow into our environment and bodies are from this source. Toxins we eliminate and are used in fertilizers are then used in farming and distributed as garden fertilizer. We know pesticide main ingredients and their "inerts" can be deadly. These are used in public parks, on roadsides, allowed on private properties, etc.. These are linked to wide numbers of human disorders as well as to death of humans and animals. We try to clean up our marine life to bring back the salmon but release fertilizers and pesticides which flow back into the waters and kill the salmon. This is nuts.

Recently, WSU researchers found toxins not only damage the physiology of the generation exposed, but that the damage is passed on for generations, hence the skyrocketing medical costs.

Ecology must get serious with this PBT rule making and go back to the legislature and graphically educate elected leaders on the associated health disorders and deaths associated with these two categories of toxins. They must come under the PBT rule. All this time, money and energy going into adopting and enforcing the PBT rule should not be undercut.

Please keep us posted as the process moves forward. Thank you,

Darlene Schanfald, Secretary
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